

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

**KOLBY DUCKETT, DAVID SCHILLING,
and DAVID HOLLOWAY,**

Plaintiffs,

v.

No. 1:19-cv-00295

**CHIEF BRIAN HICKMAN, TED ROGERS,
and THE CITY OF COLLEGEDALE,
TENNESSEE,**

Defendants.

NOTICE TO TAKE DEPOSITION OF DAVID SCHILLING

Please take notice that on August 26, 2020 at 9:30 a.m. at the offices of Robinson, Smith & Wells, PLLC, 633 Chestnut Street, Suite 700, Chattanooga, TN 37450, Defendant Brian Hickman, by and through his counsel Benjamin K. Lauderback, will take the deposition of Plaintiff David Schilling, upon oral examination, pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a Notary Public, or other officer authorized by law to take depositions. The deposition of David Schilling will continue from day to day until completed. This deposition shall be taken by stenographic recording for the purposes of being presented to the jury at the trial of this matter consistent with the Federal Rules of Civil Procedure. You are hereby notified to appear and take part in said examination as you deem appropriate.

This Plaintiff is asked and required to bring any and all documents requested as responses to the interrogatories and requests for production of documents previously sent to you, any and all documents and exhibits listed in your initial disclosures, any proof of damages, including for lost wages and lost earning capacity, that you are claiming in this case, as well as evidence of any kind and/or recordings of any kind in his possession that he claims support the allegations made in his

Complaint. This request is made pursuant to Rule 30(b)(2) and Rule 34 of the Federal Rules of Civil Procedure. Please see the Interrogatories and Requests for Production of Documents previously forwarded to this Plaintiff through his counsel.

RESPECTFULLY SUBMITTED this 14th day of August, 2020.

CHIEF BRIAN HICKMAN

By: /s/ Benjamin K. Lauderback
BENJAMIN K. LAUDERBACK, BPR No. 020855
BRIAN R. BIBB, BPR No. 031024
WATSON, ROACH, BATSON &
LAUDERBACK, P.L.C.
900 S. Gay St., Suite 1500
Knoxville, TN 37902

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. mail. Parties may access this filing through the Court's electronic filing system.

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Philip Aaron Wells
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Dated this 14th day of August, 2020.

/s/ Benjamin K. Lauderback
BENJAMIN K. LAUDERBACK